

**AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT**

I, Jessica Dunkle, being duly sworn, do hereby state as follows:

**INTRODUCTION AND AGENT BACKGROUND**

1. Your affiant is an investigative or law enforcement officer of the United States within the meaning of 18 U.S.C. § 2510(7); that is, an officer of the United States who is empowered by law to conduct investigations of, and to make arrests for, the offenses enumerated in 18 U.S.C § 2516.

2. I am employed as a Special Agent (SA) with the Federal Bureau of Investigation (FBI), assigned to the FBI's Cleveland Field Office. I have been an FBI Agent since June 18, 2023. In joining the FBI as a SA, I initially spent five months at the FBI training academy in Quantico, Virginia, where I received training in a variety of investigative and legal matters, including the topics of Fourth Amendment searches, the drafting of search warrant affidavits, and confirmation of probable cause.

3. I am familiar with the circumstances of the offenses described in this affidavit through a combination of personal knowledge of the facts, discussion with other law enforcement officials and other investigative activities conducted and investigative materials obtained during the investigation.

4. I make this affidavit in support of an application for issuance of a criminal complaint and arrest warrant for Conner Walker (Walker), born March 27, 2003, at 3666 Spencer Road, Rocky River, Ohio 44116 for violations of Title 18 U.S. Code 18 U.S.C § 2251(a) Sexual Exploitation of Children and 18 U.S.C. §2252(a)(2) Distribution of Visual Depictions of Minors Engaged in Sexually Explicit Conduct. This affidavit does not include all facts known to me, but rather contains facts sufficient to support the issuance of an arrest warrant.

### **STATEMENT OF FACTS**

5. On or around January 3, 2024, FBI Cleveland received an investigative lead concerning the production of Child Sexual Abuse Material (CSAM). The lead was sent from FBI Headquarters, who in turn had received information from a reliable foreign partner who had determined the CSAM be of North American origin. FBI Headquarters used an available open-source repository to potentially match the minor victim with a Cleveland-based child's whose image appeared on her family's Facebook page.

6. On January 5, 2024, FBI Agents spoke with A.G.<sup>1</sup> who owned the Facebook page that depicted the suspected minor victim and was the likely parent or guardian. A.G. was shown sanitized photographs of the minor victim and identified the minor victim as her daughter. A.G. confirmed that the minor victim is 3 years old (investigation showed that the minor victim was two years old at the time of the abuse). A.G. identified the hand in the photograph as being of a lighter complexion and provided law enforcement with the identities of white males who potentially had access to the minor victim, in particular at the home daycare in which the minor victim was enrolled.

7. Following the meeting with A.G. on January 5, 2024, Agents went to the identified home daycare located at 6565 Big Creek Parkway, Parma Heights, Ohio 44130 in the Northern District of Ohio Eastern Division and spoke with the owner. The owner told investigators that two Caucasian adult males were present in the home. One of the males was Conner Walker (Walker), the owner's adult son's friend who routinely slept over at the home. Walker was on site and consented to an interview with Agents.

8. Walker described spending a significant amount of time at the daycare and

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<sup>1</sup> A.G.' is known to the FBI and her full-name has been redacted to protect the identity of the child-victim pursuant to 18 U.S.C. §3509.

often spent the night there. One evening in late Fall 2023 (he was unsure of the exact date), Walker exited the shower (from one of two bathrooms located on the main level) when the minor victim entered the bathroom. The minor victim was staying overnight at the daycare. Walker instructed the minor victim to open her mouth. Walker then rubbed his erect penis onto the minor victim's tongue. Walker recorded approximately two minutes of the abuse which he claimed was its entirety.

9. Walker subsequently distributed the video to a group chat on an iPhone app called "Session".<sup>2</sup> Walker advised that his phone still retained the video, as well as other CSAM.

10. Walker gave written consent to search his iPhone 13. A cursory manual search of the phone showed two videos of the minor victim, both of which were approximately two minutes in length. Upon review, investigators observed approximately 3-4 additional photographs of the minor victim laying on a counter, with an erect penis pressed against her vagina and her anus. The photos may be stills of a video. One of the videos seen, was previously known to law enforcement as being previously distributed CSAM.

11. Also observed on the phone were numerous additional files containing CSAM. There were a few dozen files of CSAM located in the password protected "hidden" folder in the photos app. During this initial manual cursory search, the Session app was identified on Walker's phone. In the Session app, the bulk of the conversations revolved around trading and production of CSAM, with dozens of additional images found within the group chats.

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<sup>2</sup> Session is headquartered in Melbourne, Victoria, Australia. They describe the application (app) as a private messenger offering privacy, anonymity, and security. The app provides end-to-end encryption and no phone numbers for sign-up. Session claims there is no metadata logging and protects and anonymize your Internet Protocol address. The closed group chats provide end-to-end encryption for up to 100 people.

**CONCLUSION**

12. Based on the aforementioned factual information, your Affiant respectfully submits that there is probable cause to believe that Conner Walker is in violation of Title 18 U.S. Code 18 U.S.C § 2251(a) Sexual Exploitation of Children and 18 U.S.C. §2252(a)(2) Distribution of Visual Depictions of Minors Engaged in Sexually Explicit Conduct.

*Jessica L. Dunkle*

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Jessica L. Dunkle  
Federal Bureau of Investigation  
Special Agent

This affidavit was sworn to by the affiant by telephone after a PDF was transmitted by email, per Fed. R. Crim. P. 4.1, 41(d)(3) this 09th day of January, 2024.



*J. H. DC*

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United States Magistrate Judge